
Central Coast Regional Water Quality Control Board

November 23, 2015

San Luis Obispo County Regional Airport
Kevin Bumen, Airport Manager
903 Airport Drive, Suite 5
San Luis Obispo, CA 93401

CERTIFIED MAIL NO.
7015 0640 0001 9863 5346
Return Receipt Requested

Dear Mr. Bumen:

SITE CLEANUP PROGRAM: SAN LUIS OBISPO COUNTY REGIONAL AIRPORT, 903 AIRPORT DRIVE, SAN LUIS OBISPO, SAN LUIS OBISPO COUNTY – REQUEST FOR WORK PLAN

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) is a state regulatory agency responsible for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has the authority under state law to require the submission of information, direct investigation and cleanup actions, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to request available information on current and past property owners and occupants, chemical usage, and details about industrial operations associated with current and former occupants to determine if they are the source of pollution in groundwater west of the runway. If available data indicates that the airport is a possible source of the pollution, we require the San Luis Obispo County Regional Airport to submit a work plan to perform a subsurface site investigation to evaluate whether groundwater pollution found in the vicinity of Buckley Road and Thread Lane is a result of discharges from airport-related operations.

Background

Central Coast Water Board staff recently reviewed water quality information from three supply wells located in close proximity to 795 Buckley Road. Concentrations of the chlorinated solvent trichloroethene [TCE] have been detected in one or more supply wells since 2003. Environmental site investigations conducted at nearby industrial properties have not identified a source of TCE; therefore, the source of TCE may be from the airport because regional groundwater flow is from east to west and the aircraft industry in general used TCE as a solvent in the past to clean airplane parts.

When the supply wells were initially tested in the early 2000s, monitoring data indicated a maximum TCE concentration of 320 micrograms per liter ($\mu\text{g/L}$) in groundwater. Since that time, TCE concentrations have fluctuated but there is an overall decreasing trend. The most recent groundwater monitoring data indicate a maximum TCE concentration of 61 $\mu\text{g/L}$ in groundwater. The California Department of Public Health's maximum contaminant level for TCE is 5 $\mu\text{g/L}$ in groundwater (the drinking water standard), which is also the water quality objective in the Central Coast Water Board's Basin Plan. Therefore, the current maximum concentration of TCE detected in groundwater is 12 times higher than what the California Department of Public Health has determined to be safe to drink.

According to regional groundwater potentiometric surface maps, groundwater flows east to west in the area, which means that the southern portions of the airport are upgradient of the impacted wells. TCE is known to have been used for airplane parts washing up to the 1970s when it was phased out of use because of its toxicity. In addition, a common practice, especially with the military, was to spray-wash airplanes with TCE, often allowing the waste to discharge to the ground. According to our records, the SLO Airport was used by the military during World War II.

To evaluate if the past or current aircraft or other operations are potential sources of the TCE pollution detected in groundwater, the Central Coast Water Board requires the following information no later than **January 20, 2016**:

1. Information on current and former owners, tenants, and operators of properties within the area now controlled by the San Luis Obispo County Airport, along with descriptions of present and historic businesses and the locations where they operated.
2. An estimate of quantity of TCE (or other solvents) used at each of the identified properties (if applicable).
3. Details on the location where current and former aircraft or other operations used, stored, or disposed of TCE (if applicable).
4. Copies of all environmental reports pertaining to operations at the airport, including, but not limited to records of waste disposal.
5. Information on any supply wells and monitoring wells located on the airport property, including well construction details and laboratory analytical results.
6. Current and historical aerial photos and surface drainage maps for the runway and associated industrial buildings.
7. Provide one of the following:
 - A statement that data provided above are sufficient to show that TCE impacts in the Buckley Road area are not the result of discharges from the airport or
 - A work plan to perform an environmental investigation along Buckley Road to investigate whether TCE in groundwater is from the airport. Proposed collected data shall include, but is not limited to, groundwater grab samples and sediment/soil samples at locations where surface water formerly drained and currently drains from the airport area.

Legal Requirements

The Central Coast Water Board's requirement that you submit this information is made pursuant to Section 13267 of the California Water Code. Pursuant to Section 13268 of the California Water Code, a violation of a Water Code Section 13267 requirement may subject you to civil liability of up to \$1,000 per day for each day in which the violation occurs.

The Water Board needs the required information in order to determine if past and current airport operations are a source of pollution for the TCE detected in groundwater. You are required to submit this information because you are the current property owner. The evidence supporting this requirement is described above.

Any person affected by this action of the Central Coast Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The petition must be received by the State Water Board, Office of Chief Counsel, P. O. Box 100, Sacramento, 95812 within 30 days of the date of this order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

If you have questions, please contact **Dean Thomas at (805) 549-3690 or Dean.Thomas@waterboards.ca.gov** or Thea Tryon at (805) 542-4776.

Sincerely,

for Kenneth A. Harris Jr.
Executive Officer

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cc via email:

Ms. Leslie Manly
Thread Lane Resident
lesliem.manly@gmail.com

Mr. Toby Moore
Water Resources Manager/Chief Hydrogeologist
Golden State Water Company
TobyMoore@gswater.com

Mr. Curtis Batson, Director
County of San Luis Obispo Environmental Health Services
cbatson@co.slo.ca.us

Ms. Leslie Terry
County of San Luis Obispo Environmental Health Services
Lterry@co.slo.ca.us

Mr. Richard Lichtenfels
County of San Luis Obispo Environmental Health Services
rlichtenfels@co.slo.ca.us

Mr. Kurt Souza
Regional Engineer, Drinking Water Program
California Department of Public Health
Kurt.Souza@cdph.ca.gov

Mr. Dean Thomas
Central Coast Water Board
Dean.Thomas@waterboards.ca.gov

CR# none
Global ID# none